

RECEIVED FEC MAIL ROOM , FOR MAY 10 P 12: 37

John D. Gibson
Federal Election Commission
999 E Street, NW
Washington, DC 20463

May 8, 2001

Reference: Amended September Monthly Report (8/1/2000-8/31/2000), received 2/12/01 and Amended October Monthly Report (9/1/00-9/30/00), received 2/12/01

Dear Mr. Gibson,

In response to your Request for Additional Information of April 19th, 2001, this letter clarifies our best efforts practices in accordance with regulations promulgated by the Commission. As stated in our letter of April 9th, we are using a standard disclaimer on all political action committee solicitations which states:

Contributions or gifts to HRC-PAC are not tax deductible as charitable contributions or as business expenses under IRC § 162(e). Federal law requires us to use our best efforts to report the name(s), mailing address, occupation and employer of individuals whose contributions exceed \$200 in a calendar year.

Also please find enclosed an example of both a recent original solicitation and the standard "follow-up" letters sent to HRC PAC contributors who fail to provide the requested information. These letters are sent out on a monthly basis. In reviewing our procedures, in order to prepare a response to this letter, we confirmed that these letters are sent out no more than one month from the date of receipt of the contribution.

Contributor information we receive in response to our solicitations and follow-up letters is put into our database. We are currently reviewing our procedures to ensure that this information is consistently reported with the next regularly scheduled report as specified under section 104.7 of the regulations. While the reports referenced in your letter fall outside the current election cycle, we have filed electronically an amended memo Schedule A (FEC-14154) disclosing any contributor information that has been received. Due to a technical issue with our software, we have been unable to include a text reference to the report on which the original receipt appeared. We are working with our software vendor, Gnossos Software, Inc. to receify this and will amend the Schedule A as soon as the software

problem has been corrected. In addition, we will continue to file amended Schedules A with our monthly reports when we receive contributor information related to reports that cover this two-year election cycle.

Additionally, we will be reviewing other reports, to ensure that any other recently submitted data can be amended to future reports, and we will continue to examine and improve our procedures as we move forward.

It is my understanding that this letter addresses all of the issues presented in your request. If you have any further questions, please feel free to contact our Deputy PAC Director, Mike Mings at (202) 216-1545 or mike,mings@hrc.org.

Sincerely,

Elizabeth Birch

Executive Director, Human Rights Campaign Treasurer, Human Rights Campaign PAC

Cc: Steve Kantor, President, Gnussos Software, Inc.

Federal Election Commission

FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received. Date of Receipt Hand Delivered POSTMARKED First Class Mail 5 -8 -01 POSTMARKED (R/C) Registered/Certified Mail No Postmark Postmark Illegible Date of Receipt Received from the House office of Records and Registration Date of Receipt Received from the Senate Office of Public Records Postmarked Other (Specify): and/or Date of Receipt Electronic Filing 510-01 -DATE PREPARED EPARER